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9 **UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

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11 NUCLEAR CARE PARTNERS, LLC, A
Nevada Limited Liability company,

12 Plaintiff,

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14 v.

15 RUBEN MENDOZA, an individual;
STEPHEN BURR, an individual; and
16 ATOMIC WORKERS ALLIANCE, LLC, A
Tennessee Limited liability company

17 Defendants.
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Case No.: 2:24-cv-01441-GMN-DJA

**STIPULATION AND ORDER
EXTENDING TIME FOR DEFENDANT
STEPHEN BURR TO RESPOND TO
PLAINTIFF'S MOTION FOR
TEMPORARY RESTRAINING ORDER
(SECOND REQUEST)**

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20 Plaintiff Nuclear Care Partners, LLC ("NCP"), by and through its counsel, Benjamin M.
21 Wegener, Esq., of Wegener Lane & Evans, P.C., and Defendant Stephen Burr ("Burr"), by and
22 through his counsel of record, Todd Dressel, Esq., of McGuireWoods, LLP, hereby stipulate as
23 follows:

24 1. NCP, Defendant Atomic Workers Alliance, LLC and Burr are continuing
25 discussions in good faith to fully resolve this matter without further judicial involvement. While
26 the parties have not reached a final resolution, the parties have made meaningful progress and
27 would like to continue said discussions before moving forward with litigation, including the costs
28 associated with motion practice.

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STIPULATION AND ORDER EXTENDING TIME FOR DEFENDANT STEPHEN BURR TO RESPOND TO
PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER (SECOND REQUEST)

Case No.: 2:24-cv-01441-GMN-DJA

2. The parties are committed to devoting resources to resolution at this stage and believe they will be able to resolve this in the coming thirty (30) days.

3. Accordingly, NCP and Burr stipulate to continue the deadline for Burr to respond to NCP's Motion for Temporary Restraining Order (ECF No. 7) by three weeks, from December 13, 2024 to January 3, 2025.

4. This is the Parties' second request for an extension.

IT IS SO STIPULATED.

DATED this 13th day of December, 2024

Submitted by:

By: /s/ Benjamin M. Wegener

Michael M. Edwards, Esq.

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Pro Hac Vice Pending

Counsel for Plaintiff

-and-

/s/ Todd J. Dressel

Todd J. Dressel, Esq.

McGuireWoods LLP

201 Clay St., Suite 1300

San Francisco, CA 94111

Counsel for Defendant Atomic Workers Alliance, LLC

ORDER

GRANTED this 16 day of December, 2024.

IT IS SO ORDERED.



HONORABLE PRESIDING JUDGE
GLORIA M. NAVARRO

CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2024, I electronically filed the foregoing document entitled **STIPULATION AND ORDER EXTENDING TIME FOR DEFENDANT STEPHEN BURR TO RESPOND TO PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER (SECOND REQUEST)** with the United States District Court, District of Nevada using the CM/ECF system and served a copy of same upon all counsel of record via the Court's electronic filing system.

/s/ Todd J. Dressel

Todd J. Dressel